

REMARKS

Applicant thanks the Examiner for indication that the drawings filed on March 5, 2002, are accepted by the Office.

The acknowledgment of a claim for foreign priority under 35 U.S.C. §119 and indication that certified copies of the priority documents have been received by the Office is also noted with appreciation.

The Examiner objected to the specification for the following informality: on page 7, line 17, of the specification the first occurrence of "second language" should be changed to "first language". Responding to this objection, the specification has been corrected in this and several others instances correcting inaccuracies and grammatical errors. No new matter has been introduced by this amendment.

Claim 4 also was objected to for using the term "said options". The Examiner erroneously stated that the term "options" has not been presented by the preceding claims and therefore lacks an antecedent basis. However, the "options" is introduced by claim 2. Therefore, responding to the objection, claim 4 has been amended to change dependency. Analogously, claim 6 also has been amended to be dependent from claim 2. No new matter is introduced by this amendment.

Claims 1 to 12 are currently active in the application. By the present amendment claim 1 has been amended to emphasize the unique features of the present invention. The support for amended claim 1 can be found in at least Figure 21 and page 21, lines 25 to 27, of the specification. Additionally, claims 4 and 6 have been amended in terms of dependency in order to provide a proper antecedent basis for a term "options" as the Examiner pointed out. No new matter is introduced by this amendment.

Claims 1 to 8, 11 and 12 have been rejected under 35 U.S.C. §102(b) as being anticipated by patent to Chanod et al. (U.S. Patent 6,622,123). This rejection is respectfully traversed.

The present invention is intended to provide an assistance in establishment

of a conversation for at least two persons speaking the different languages. The claimed system allows to users to actively assist the situation of several languages communication when in order to understand each other could be sufficient to use just a few words, picture or gesture. The claimed assist system effectively uses multimedia in order to provide participants of a conversation with useful and quick information during a conversation. Initially, a user selects a conversational situation within which a potential dialog is planned. The selected conversational situation provides a user with a list of useful language units. Specifically, each language unit, which could be a single word, a combination of few words or a sentence, is presented on a display screen simultaneously in several ways: by illustration or so-called graphical image related to meaning of a particular language unit, a language unit presented in a first language, a phonetic expression of said language unit in second language and voice output activation corresponding to the language unit presented in the second language. Such complex approach in presentation of every language unit allows to the participants of the conversation very easily to find necessary words and establish an effective communication in very dynamic way. It should be particular noted that the claimed system is more oriented for real life conversational situations wherein a very precise and grammatically accurate translation is not necessary and could be sacrificed in order to comprehend a speaker's intention more quickly.

The patent to Chanod et al. discloses an interactive translation system that utilizes a collection of predefined core sentences in a source language, that may be initially accessed through a thematic hierarchy or through key words. According to Chanod et al., new sentences may be recursively elaborated through transformations of a selected core sentence, that comprise substitution and expansion and automatic handling of syntactic modifications of the interlingual structure is provided. The patent to Chanod et al. is more oriented to generate an accurate translation of preselected sentence from the one language to another. The Chanod et al. system is also intended to make the translation more sophisticated by providing an option for the user to find a plurality of substitutions for each

word in the sentence. This is totally different from the system proposed by the Applicant.

As it was discussed previously, the Applicant intends to provide the system to be used in dynamic verbal conversation for which multimedia is effectively used. In order to emphasize this issue claim 1 has been amended to show the complexity of multimedia usage in a language unit representation by the present amendment. Specifically, claim 1 as amended now recites: "A multilingual conversation assist system for assisting a conversation between users of a plurality of languages, comprising

a first means for setting a conversational situation and

a second means for storing and displaying language units corresponding to the selected conversation situation,

wherein displaying of language unit is made effectively using multimedia so as each language unit is represented by a graphic image corresponding to a particular language unit, a language unit presented in a first language, a phonetic expression of said language unit in second language, and voice output activation corresponding to the language unit presented in the second language. (Emphasis added).

Furthermore, MPEP 2131 mandates that "TO ANTICIPATE A CLAIM THE REFERENCE MUST TEACH EVERY ELEMENT IN THE CLAIM". Furthermore, the MPEP, citing *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1051, 1053, (Fed. Cir. 1987), states "[t]he identical invention must be shown in as complete detail as is contained in the ...claim" (emphasis added)

Here, none of the limitations highlighted in Applicant's claim above is taught or suggested by Chanod et al. It is therefore respectfully submitted that the rejections to the claims are improper under 35 U.S.C. §102 as Chanod et al. cannot anticipate the rejected claims since it does not "teach the identical invention". Further, since the above limitations are not taught or suggested, Chanod et al. cannot be used to support a *prima facie* obviousness under 35 U.S.C. §103.

However, the Examiner rejected claims 9 and 10 under 35 U.S.C. 103(a) as being unpatentable over the same reference to Chanod et al. This rejection is respectfully traversed based on the above amendment.

The rejected claims 9 and 10 both are indirectly depend from the currently amended claim 1 and therefore are allowable in view of the present amendment.

Based on the above discussion with reference to the MPEP guidelines, it is respectfully requested that the rejections based on 35 U.S.C. §§102 and 103 be withdrawn, application reconsidered and passed to issue.

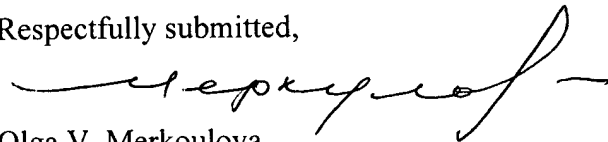
For the reasons advanced, it is submitted that claims 1 to 12 clearly define over the prior art relied on by the Examiner. The prior art cited but not relied on by the Examiner has been reviewed, but for the reasons already advanced, that prior art is similarly not relevant to the invention as now claimed.

In view of the foregoing, it is respectfully requested that the application be reconsidered, that claims 1 to 12 be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

A provisional petition is hereby made for any extension of time necessary for the continued pendency during the life of this application. Please charge any fees for such provisional petition and any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041 (Whitham, Curtis & Christofferson, P.C.).

Respectfully submitted,



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